

Exhibit 2

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

STATE OF MISSISSIPPI, *et al.*,

Plaintiffs,

v.

XAVIER BECERRA, in his official capacity
as Secretary of Health and Human Services,
et al.,

Defendants.

Civil Action No. 1:22-cv-00113-HSO-RPM

DEFENDANTS' RESPONSE TO PLAINTIFFS' FIRST SET OF INTERROGATORIES

Pursuant to Federal Rules of Civil Procedure 26 and 33, and pursuant to the Court's March 28, 2024 Memorandum Opinion and Order and April 10, 2024 Scheduling Order, Defendants hereby submit the following response to Plaintiffs' First Set of Interrogatories.

RESPONSE TO INTERROGATORY

1. Identify by name and address every person in the Plaintiff States who declared to Defendants completion of an anti-racism plan as a clinical practice improvement activity in performance year 2022.

RESPONSE:

The following natural or artificial persons attested to Defendants that they completed MIPS clinical practice improvement activity IA_AHE_8 in performance year 2022 by creating and implementing an anti-racism plan for a minimum of 90 continuous days in 2022:

ALABAMA POST-ACUTE MEDICAL SERVICE 1 PC
2500 RIVER HAVEN DR
HOOVER, AL 35244-1226

EMERGENCY SERVICES OF MONTGOMERY PC
400 TAYLOR RD
MONTGOMERY, AL 36117-3512

HOSPITAL MEDICINE ASSOCIATES LLC
50 MEDICAL PARK DR E
BIRMINGHAM, AL 35235-3401

HOSPITAL PHYSICIAN SERVICES - SOUTHEAST PROFESSIONAL
CORPORATION
1000 1ST ST N
ALABASTER, AL 35007-8703

INPATIENT CONSULTANTS OF ALABAMA, INC
2435 COLUMBIANA RD
BIRMINGHAM, AL 35216-2569

LIFESTYLE MANAGEMENT OF BIRMINGHAM, INC
10 OLD MONTGOMERY HWY
BIRMINGHAM, AL 35209-8401

PARAGON CONTRACTING SERVICES LLC
2105 E SOUTH BLVD
MONTGOMERY, AL 36116-2409

SOUTHEAST PHYSICIAN NETWORK, P.C.
1400 AFFLINK PL
TUSCALOOSA, AL 35406-2452

THOMASVILLE REGIONAL MEDICAL ASSOCIATES LLC
300 MED PARK DR
THOMASVILLE, AL 36784-5760

SOUTHEASTERN EMERGENCY PHYSICIANS LLC
211 CRAWFORD MEMORIAL DR
VAN BUREN, AR 72956-5322

ACS PRIMARY CARE PHYSICIANS-MIDWEST
150 N EAGLE CREEK DR
LEXINGTON, KY 40509-1805

HOSPITAL MEDICINE SERVICES OF TENNESSEE PC
1099 MEDICAL CENTER CIR
MAYFIELD, KY 42066-1159

KENTUCKY POST-ACUTE MEDICAL SERVICES 1 PSC
571 WESTPORT RD
ELIZABETHTOWN, KY 42701-2949

BODY-MIND-SPIRIT PODIATRIC CENTER, PLLC
BRIAN K. BAILEY, DPM, MS
500 14TH ST
ASHLAND, KY 41101-2622

ACS PRIMARY CARE PHYSICIANS LOUISIANA PC
211 4TH ST
ALEXANDRIA, LA 71301-8421

ACS EMERGENCY SERVICES OF MISSISSIPPI PROFESSIONAL ASSOCIATION
901 E SUNFLOWER RD
CLEVELAND, MS 38732-2833

CLINICAL RADIOLOGISTS SC
51 GODWIN LN
SAINT LOUIS, MO 63124-1541

IPC PAC HEALTHCARE SERVICES OF MISSOURI INC
1800 S SWOPE DR
INDEPENDENCE, MO 64057-1084

SOUTHEASTERN EMERGENCY PHYSICIANS OF MEMPHIS LLC
1225 GRAHAM ROAD
FLORISSANT, MO 63031-8012

Dated: April 17, 2024

Respectfully submitted,

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General
Civil Division

MICHELLE BENNETT
Assistant Director, Federal Programs Branch

/s/ Brian Rosen-Shaud
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